

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

TODD GROSS,

Defendant.

NO. CR23-5262 RAJ

**ORDER FOR RESTITUTION**

On or about October 18, 2024, this Court entered an Order terminating Defendant's participation in the Drug Reentry Alternative Model (DREAM) program, granted Defendant's request to withdraw his previously entered guilty plea, and granted the government's request to dismiss the criminal charges filed in this case with prejudice.

In addition, the Court having reviewed the parties' *Stipulation for Order Regarding Payment of Restitution and Retention of Jurisdiction for Enforcement* filed on or about October 18, 2024, hereby accepts the *Stipulation* as drafted and orders:

1. The Court finds, pursuant to 18 U.S.C. § 3664(h), the Defendant is liable for restitution in the amount of \$218,908.40.

2. Restitution in the amount of \$218,908.40 to Lululemon shall be due and payable immediately. All payments shall be made to the United States District Court for the Western District of Washington, with the Clerk forwarding money received to the victim as follows:

1 Lululemon  
2 1280 Burrard Street – 11<sup>th</sup> Floor  
3 Vancouver, BC V6Z1Z1

4 3. Defendant shall continue making restitution payments through the clerk of  
5 the court in the amount of no less than \$100 per month with the minimum payment  
6 subject to revision by order of the Court depending upon Defendant's financial  
7 circumstances, until the restitution obligation is satisfied. Payments shall be made to the  
8 United States District Court, Western District of Washington, referencing case No.  
9 CR23-5262 RAJ, using one of the following methods:

10 a. Online payments through the U.S. Treasury website, Pay.gov, using  
11 a checking account, savings account or a card (credit, debit or prepaid);

12 b. Personally or by First Class Mail to:  
13 United States District Court, Western District of Washington  
14 Attn: Financial Clerk – Lobby Level  
15 700 Stewart Street  
16 Seattle, Washington 98101

17 4. Compliance with this obligation shall be enforced as follows:

18 a. Defendant shall report all restitution payments, specifying the  
19 amounts paid and providing proof of payment, in writing to United States Probation, U.S.  
20 Probation Office – Western District of Washington, 700 Stewart Street, Suite 11101,  
21 Seattle, Washington 98101, and the U.S. Attorney's Office, Attn: DREAM Executive  
22 Review Team, 700 Stewart Street, Suite 5220, Seattle, Washington 98101, on a quarterly  
23 basis, that is, within one week following expiration of each 90-day period after dismissal  
24 of criminal charges;

25 b. Defendant shall report employment and wage information,  
26 specifying employer name, address and phone number, and wage/salary amount, in  
27 writing to United States Probation and the U.S. Attorney's Office, within one week after  
28 employment commences;

29 c. Defendant shall report change of residential address and phone  
30 number in writing to United States Probation and the U.S. Attorney's Office within one  
31 week of a change;

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1           d.       In the event the U.S. Attorney's Office believes Defendant has  
2 defaulted on his restitution obligation, it shall first advise him in writing and provide an  
3 opportunity to cure the default or submit a written explanation to the U.S. Attorney's  
4 Office within one week of receiving the default notice;

5           e.       If, after reviewing Defendant's response, the U.S. Attorney's Office  
6 continues to believe Defendant has defaulted on his restitution obligation, it shall file  
7 with the court an *ex parte* application seeking an order to show cause why Defendant  
8 should not be held in contempt for failing to comply with the Court's order regarding  
9 restitution.

10          5.       This Court shall retain jurisdiction over this matter for purpose of enforcing  
11 this Order.

12           IT IS SO ORDERED.

13           DATED this 18th day of October, 2024.

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15           The Honorable Richard A. Jones  
16 United States District Judge  
17 Western District of Washington  
18 DREAM Judicial Officer  
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